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The Trusted Integrator for Sustainable Solutions

July 27, 2016

Ms. Denise Zeno, Task Monitor
U.S. Environmental Protection Agency
290 Broadway - 18th Floor
New York, NY 10007-1866

Document Control Nos.: W0357.1F.01028

Subject: Abbreviated Preliminary Assessment Checklist
PRIDCO Building No. T-1292-0-80
TDD No.: 0004/1605-13
Contract No.: EP-S8-13-01 (Region 8 START IV)

Dear Ms. Zeno,

Weston Solutions, Inc. (WESTON®) is pleased to submit the Abbreviated Preliminary Assessment Checklist for the PRIDCO Building No. T-1292-0-80 site (EPA ID No. PRN000202718) located in Cayey, Puerto Rico. If you have any questions, please contact me at (732) 417-5814.

Very truly yours,

A handwritten signature in black ink that reads "Denise Breen". The signature is written in a cursive, flowing style.

WESTON SOLUTIONS, INC.
Denise Breen
Associate Project Scientist

enclosure

cc: C. Romano, EPA (w/o enclosure)
 M. Hauptman, EPA (w/o enclosure)
 G. Gilliland, WESTON (w/o enclosure)
 file

ABBREVIATED PRELIMINARY ASSESSMENT CHECKLIST

This checklist can be used to help the site investigator determine if an Abbreviated Preliminary Assessment (APA) is warranted. This checklist should document the rationale for the decision on whether further steps in the site investigation process are required under CERCLA. Use additional sheets, if necessary.

Checklist Preparer: Denise Breen/Associate Project Scientist July 27, 2016
 (Name/Title) (Date)
205 Campus Drive, Edison, NJ 08837 (732) 417-5814
 (Address) (Phone)
denise.breen@westonsolutions.com
 (E-mail Address)

Site Name: PRIDCO Building No. T-1292-0-80

Previous Names (if any): Macro Vue; BD Biosciences

Site Location: Road 735
 (Street)
Cayey, Puerto Rico 07736
 (City) (ST) (Zip)
N/A N/A
 (Block) (Lot)

Latitude: +18.126939° **Longitude:** -66.139039°

* The site location coordinates were obtained from the EPA Superfund Enterprise Management System (SEMS).

Describe the release (or potential release) and its probable nature:

In December 2008, analytical results for groundwater samples collected from water supply wells in Cayey by Region 2 Site Assessment Team 2 (SAT 2) indicated the presence of trichloroethylene (TCE) and bromodichloromethane at levels exceeding Hazard Ranking System (HRS) Level 1 benchmarks and tetrachloroethylene (PCE) exceeding the sample quantitation limit. As part of the Cayey Site Discovery Initiative project in 2009, WESTON personnel observed Puerto Rico Industrial Development Company (PRIDCO) Building No. T-1292-0-80, located approximately 1.5 miles northeast from the contaminated well.

Information provided by PRIDCO indicates that the building was constructed in 1980. The building, which is situated on Lots 4 and 6 of the Cayey East Industrial Subdivision, is currently owned by Becton, Dickinson and Co. (BD) and utilized by the BD Biosciences Division, which brings innovative diagnostic and research tools to scientists involved in biomedical research. The building and associated property (i.e., Lots 4 and 6) were sold by PRIDCO to Macro Vue, Inc. in 1982. The information provided by PRIDCO does not specify the occupancy and use of the building from 1980 to 1982. An Internet search and review of EPA on-line databases did not reveal any hazardous waste activity for Macro Vue. The Internet search did reveal that the Macro Vue line of products (blood test kits) is available from BD. Information regarding Macro Vue's operations or previous occupants of the facility is currently unavailable. There is an incomplete history and limited specific information on historical operations and the possible use of hazardous substances at the site. TCE and PCE have historically been used in industrial cleaning and degreasing processes, and it is possible that historical operations that were conducted at the subject property used these solvents. There are no previous soil analytical results to indicate whether or not there are any source areas or evidence of past environmental releases.

On June 16, 2016, WESTON personnel performed an on-site reconnaissance of PRIDCO Building No. T-1292-0-80. Currently, the site is owned by BD. The site encompasses the main operations facility of biochemical product manufacturing plant and offices for BD. BD is a Resource Conservation and Recovery Act (RCRA)-classified Conditionally Exempt Small Quantity Generator, utilizing and disposing of chemicals such as methanol and ethanol. The property is completely fenced and consists mostly of the facility building, with some areas of exposed soil and landscaping. East of the building, in the adjacent lot also owned and operated by BD, is a well with an approximate depth of 300 feet (sampled by WESTON personnel in January 2015 and June 2016), employee parking, and holding tanks for water and various substances (i.e., liquid oxygen, diesel fuel).

Based on the incomplete history of previous operations, the limited PRIDCO files and information, the historical industry and manufacturing conducted at the site that may have used hazardous substances in the manufacturing process or as a solvent for degreasing activities, and the unknown historical housekeeping processes at the site, PRIDCO Building No. T-1292-0-80 is recommended for further assessment under CERCLA.

Part 1 - Superfund Eligibility Evaluation

If all answers are “no” go on to Part 2, otherwise proceed to Part 3.

	YES	NO
1. Is the site currently in CERCLIS or an “alias” of another site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Is the site being addressed by some other remedial program (Federal, State, or Tribal)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Are the hazardous substances potentially released at the site regulated under a statutory exclusion (e.g., petroleum, natural gas, natural gas liquids, synthetic gas usable for fuel, normal application of fertilizer, release located in a workplace, naturally occurring, or regulated by the NRC, UMTRCA, or OSHA)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Are the hazardous substances potentially released at the site excluded by policy considerations (i.e., deferred to RCRA corrective action)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Is there sufficient documentation to demonstrate that no potential for a release that could cause adverse environmental or human health impacts exists (e.g., comprehensive remedial investigation equivalent data showing no release above ARARs, completed removal action, documentation showing that no hazardous substance releases have occurred, or an EPA approved risk assessment completed)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please explain all “yes” answer(s).

The CERCLIS ID is PRN000202718; the site is not currently on the National Priorities List (NPL).

Part 2 - Initial Site Evaluation

For Part 2, if information is not available to make a “yes” or “no” response, further investigation may be needed. In these cases, determine whether an APA is appropriate. Exhibit 1 parallels the questions in Part 2. Use Exhibit 1 to make decisions in Part 3.

If the answer is “no” to any of questions 1, 2, or 3, proceed directly to Part 3.

	YES	NO
1. Does the site have a release or a potential to release?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Does the site have uncontained sources containing CERCLA-eligible substances?	Unknown – EPA plans to collect samples.	
3. Does the site have documented on-site, adjacent, or nearby targets?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

If the answers to questions 1, 2, and 3 above were all “yes” then answer the questions below before proceeding to Part 3.

	YES	NO
4. Does documentation indicate that a target (e.g., drinking water wells, drinking surface water intakes, etc.) has been exposed to a hazardous substance released from the site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Is there an apparent release at the site with no documentation of exposed targets, but there are targets on site or immediately adjacent to the site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Is there an apparent release and no documented on-site targets or targets immediately adjacent to the site, but there are nearby targets (e.g., targets within 1 mile)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Is there no indication of a hazardous substance release, and there are uncontained sources containing CERCLA hazardous substances, but there is a potential to release with targets present on site or in proximity to the site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

EXHIBIT 1
SITE ASSESSMENT DECISION GUIDELINES FOR A SITE

Exhibit 1 identifies different types of site information and provides some possible recommendations for further site assessment activities based on that information. You will use Exhibit 1 in determining the need for further action at the site, based on the answers to the questions in Part 2. Please use your professional judgment when evaluating a site. Your judgment may be different from the general recommendations for a site given below.

Suspected/Documented Site Conditions		APA	Full PA	PA/SI	SI
1. There are no releases or potential to release.		Yes	No	No	No
2. No uncontained sources with CERCLA-eligible substances are present on site.		Yes	No	No	No
3. There are no on-site, adjacent, or nearby targets.		Yes	No	No	No
4. There is documentation indicating that a target (e.g., drinking water wells, drinking surface water intakes, etc.) has been exposed to a hazardous substance released from the site.	Option 1: APA →SI	Yes	No	No	Yes
	Option 2: N/A	N/A	N/A	N/A	N/A
5. There is an apparent release at the site with no documentation of exposed targets, but there are targets on site or immediately adjacent to the site.	Option 1: APA →SI	Yes	No	No	Yes
	Option 2: N/A	N/A	N/A	N/A	N/A
6. There is an apparent release and no documented on-site targets and no documented targets immediately adjacent to the site, but there are nearby targets. Nearby targets are those targets that are located within 1 mile of the site and have a relatively high likelihood of exposure to a hazardous substance migration from the site.		No	No	No	Yes
7. There is no indication of a hazardous substance release, and there are uncontained sources containing CERCLA hazardous substances, but there is a potential to release with targets present on site or in proximity to the site.		No	No	No	Yes

Part 3 - EPA Site Assessment Decision

When completing Part 3, use Part 2 and Exhibit 1 to select the appropriate decision. For example, if the answer to question 1 in Part 2 was “no,” then an APA may be performed and the “NFRAP” box below should be checked. Additionally, if the answer to question 4 in Part 2 is “yes,” then you have two options (as indicated in Exhibit 1): Option 1 --conduct an APA and check the “Lower Priority SI” or “Higher Priority SI” box below; or Option 2 -- proceed with a combined PA/SI assessment.

Check the box that applies based on the conclusions of the APA:

- | | |
|--|--|
| <input type="checkbox"/> NFRAP | <input type="checkbox"/> Refer to Removal Program - further site assessment needed |
| <input checked="" type="checkbox"/> Higher Priority SI | <input type="checkbox"/> Refer to Removal Program - NFRAP |
| <input type="checkbox"/> Lower Priority SI | <input type="checkbox"/> Site is being addressed as part of another CERCLIS site |
| <input type="checkbox"/> Defer to RCRA Subtitle C | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Defer to NRC | |

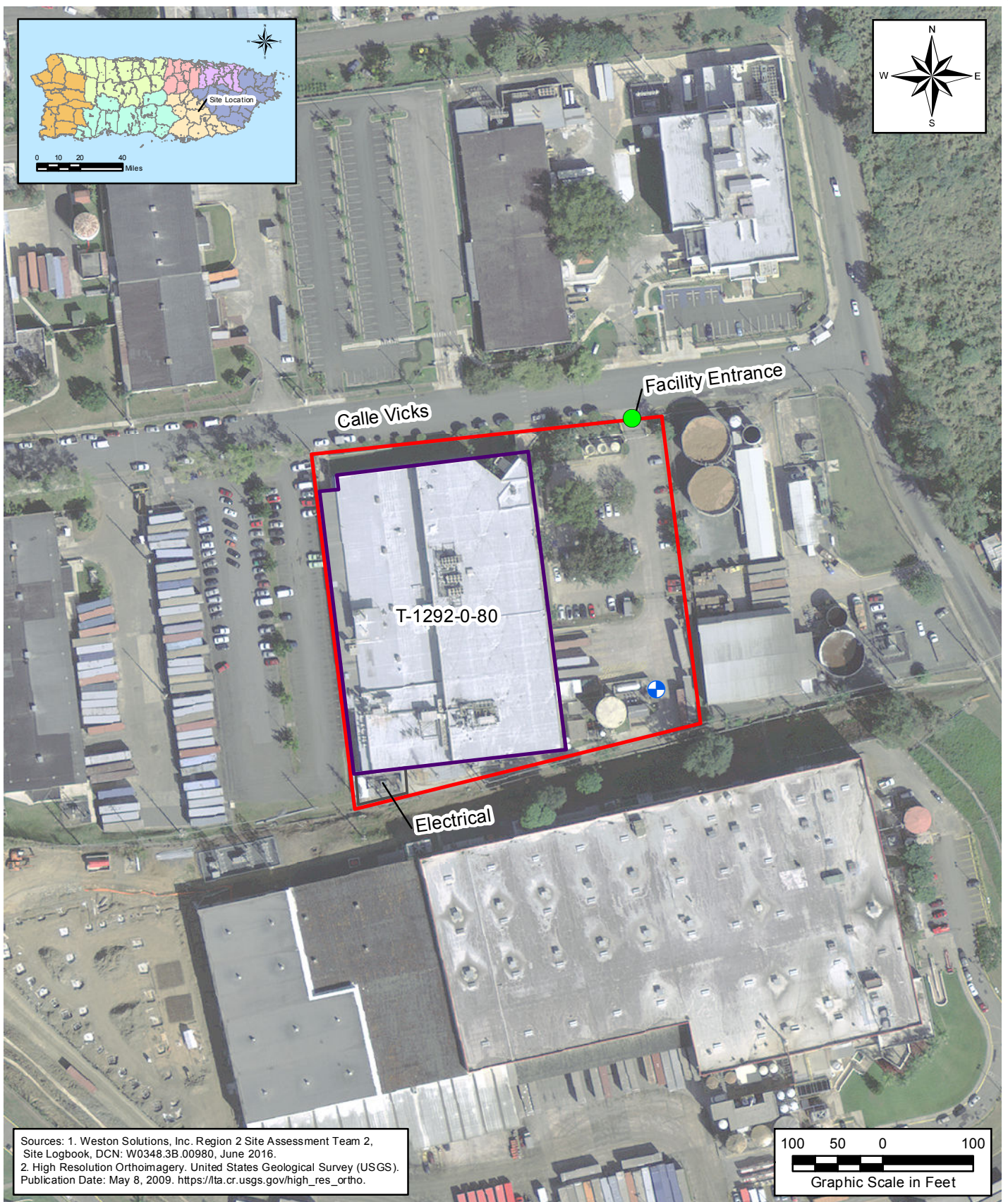
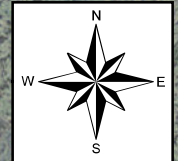
Regional EPA Reviewer:

 Print Name/Signature




 Date

PLEASE EXPLAIN THE RATIONALE FOR YOUR DECISION: The Higher Priority SI decision is based on a lack of sufficient analytical data to exclude the site as a source, the possibility of historical releases of CERCLA-eligible substances, possible historical use of PCE or TCE as degreasing solvents, and the close proximity to supply wells where contaminants have been detected.

APPENDIX A
FIGURE



LEGEND:

-  Well
-  Building Footprint
-  Property Boundary

SCALE:

1" = 150'

CLIENT NAME:

USEPA

TITLE:

Site Map PRIDCO Building No. T-1292-0-80 Cayey, Puerto Rico



DATE:

July 2016

FIGURE #:

1

APPENDIX B
PHOTO DOCUMENTATION

Photographs

Contract No./WO Number	Site Name/Location	Date	Page
EP-S8-13-01	PRIDCO Building No. T-1292-0-80	6/16/2016	Page 1 of 2
Task No. 0357	Cayey, Puerto Rico		



Photograph 1 – View looking south of the employee parking area and exposed soil east of the building on the property.



Photograph 2 – View looking west along the southern boundary of the site. Numerous aboveground storage tanks are located on the adjacent block and lot owned and operated by Becton Dickinson.

Photographs

Contract No./WO Number	Site Name/Location	Date	Page
EP-S8-13-01	PRIDCO Building No. T-1292-0-80	6/16/2016	Page 2 of 2
Task No. 0357	Cayey, Puerto Rico		



Photograph 3 – View looking east along the northern boundary of the site. A few underground lines are located in this portion of the property.



Photograph 4 – Exposed soil located on the northeastern portion of the facility.